Comments from Ray Lam, Silk Road Environmental (1-5)

1. **Mr. Lam submitted comments on the previous permit regarding air permitting. He commented that several pollutants seemed to be slightly under New Source Review (NSR) and Prevention of Significant Deterioration (PSD) limits, which appeared to be a synthetic minor. He wished to know if proposed production increase has associated air pollutants increases.**

   Ecology evaluated the impact of production increase on air emissions in the SEPA Checklist Modification review. We require the facility to submit a Notice of Construction to the Benton Clean Air Authority (BCCA) at least 90 days prior to construction commissioning. The Notice of Construction application will contain air emissions data associated with the production increase. Please contact the BCCA for air emission data.

2. **Mr. Lam requested to see the list of oil/greases, Dangerous Wastes (DW) and Extremely Hazardous Waste (EHW), as required in permit condition S9.**

   Permit condition S9 requires the facility to submit the Spill Plan containing the list of all oil and petroleum products and other materials used and/or stored on site, which when spilled, would designate as DW or EHW. Ecology requires the permittee to submit the Spill Plan, including the list, 180 days after plant startup. The plant has not start up at this time. The requested list is not currently available. Please check back with Ecology at later date.

3. **Mr. Lam requested to see the previous effluent characterization report described in Appendix A.**

   Effluent characterization report is not currently available. The plant construction is not complete and the facility has not discharge or sample the effluent. The first effluent characterization report is due at the next permit renewal application. Please check back with Ecology.

4. **Where does the arsenic come from? Why is the effluent characterization detection limit for arsenic 10 times higher than the actual permit limit?**

   The facility does not use or produce arsenic. The source of arsenic is the Columbia River water, which the plant will use as cooling water. Sampling shows that the arsenic level in the river is 1.6 ug/L. The facility will use iron absorption and sand filter to treat arsenic in the cooling water before discharge.

   To determine detection limits, Ecology consulted EPA and Manchester Laboratory and surveyed contract labs and permittee labs. The best present detection limit (DL) and quantitation limit (QL) are 0.1 and 0.5 µg/L, respectively. The DL and QL are higher than the permit limit, which is based on arsenic groundwater quality criteria of 0.05 µg/L. It is not possible for the laboratories detect the presence of arsenic at the permit limit concentrations. Ecology considered the facility in compliance with the limit if the effluent is non-detect with the detection limit of 0.5 µg/L.

5. **Mr. Lam requested to see a copy of Spill Plan. He asked if spills can enter the groundwater.**

   Ecology requires the facility to submit the Spill Plan 180 after startup. The plant has not startup at this time. The Spill Plan is not currently available. Please see response to comment #2.

   Storage and handling systems must provide appropriate control measures to prevent spills from entering the groundwater. Such controls include containment equipment and berms. The Spill Plan will have a description of spill prevention measures.